## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

YASEEN TRAYNOR, on behalf of hims	elf
and all others similarly situated,	

CASE NO. 1:19-CV-02319-JGK

Plaintiff,

٧.

AMERICAN GREETINGS CORPORATION,

Defendant.

STIPULATION AND [PROPØSED]
ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for Plaintiff

Yaseen Traynor and counsel for Defendant American Greetings Corporation, as follows:

- 1. The deadline for Defendant to file an Answer, or alternatively file a letter seeking a pre-motion conference with respect to an anticipated Motion to Dismiss, is May 24, 2019.
- 2. In exchange for Plaintiff's agreement to the deadline in Paragraph 1, and conditioned upon the Court's approval of same, Defendant hereby stipulates that valid service of process has been effected upon it.
- 3. This Stipulation is without prejudice to any and all of Defendant's jurisdictional and other defenses, other than invalid service of process.
- 4. This Stipulation may be executed in counterpart, and facsimile and electronic signatures shall be deemed original for the purposes hereof.

USDC SDNY
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DATED: New York, NY

April 5, 2019

By: /s/ Yaakov Saks

Dov Mittelman Yaakov Saks Stein Saks, PLLC 285 Passaic Street Hackensack, NJ 07601 Tel: (201) 282-6500 ext 101 Attorneys for Plaintiff By: /s/ Jeffrey M. Movit

Jeffrey M. Movit (jmm@msk.com) Leo M. Lichtman (lml@msk.com) Mitchell Silberberg & Knupp LLP 437 Madison Ave., 25<sup>th</sup> Floor New York, NY 10022

New York, NY 10022 Tel: (212) 509-3900 Attorneys for Defendant

SO ORDERED: